

RASSELSTEIN HOESCH GMBH EXCLUSION REQUEST

ATTACHMENT 2 THIN GAUGES BELOW 56 POUND BASE BOX WEIGHT

- (a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States.

The merchandise subject to this request is known as double reduced electrolytically chromium- or tin-coated steel in gauges equal to or below 56 base box weight, regardless of temper, finish, coating or other properties.

The applicable HTS provisions are: 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.70.6090, 7212.10.0000, and 7212.50.0000.

- (b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the products from products for which exclusion is not sought;

See product description in (a) above.

- (c) The basis for requesting an exclusion;

Due to the fact that this material, as supplied by Rasselstein, is designed for sophisticated end uses (like DRD, low gauge can-bodies) there is a need for extra clean tin mill products, free of non-metallic inclusions. Accordingly, the steel utilized in making this product must be specially selected, and the tin mill products in question must be produced on lines utilizing non-metallic inclusion detectors (IDD-devices). Other European and Japanese producers do not have such devices. Additionally, there are elevated requirements on shape (specific flatness) and uniformity of mechanical properties to insure that the product can be processed on high-speed lines.

- (d) The names and locations of any producers, in the United States and foreign countries of the product;

Rasselstein is unable to identify any other manufacturer making this particular product.

- (e) Total U.S. Consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and the projected annual consumption for each year from 2001 to 2005, with a basis for the projection;

US Consumption:
1996-2000 85,000 short tons \$60,000,000

Annual Projection:
2001-05 85,500 short tons 60,000,000

Projections are estimates based on knowledge of actual market consumption and development.

- (f) Total US production of the product for each year from 1996 to 2000, if any;

Rasselstein is unable to provide any estimate of total US production, if any.

- (g) The identity of any US produced substitute for the product, total US production of the substitute for each year from 1996 to 2000, and the names of any US producers of the substitute;

Rasselstein is unable to identify any practical substitute product.
Higher gauge material could be used, but this would force customers to use non-optimum specifications, increasing their costs significantly.

CONCLUSION

We understand that the purpose of the USTR investigation is to determine appropriate remedies for the importation of tin mill products, which are produced by the domestic industry. We believe that US production, if any, of this product is insignificant. Accordingly, we respectfully request that thin gauge material below 56 pound box weight be excluded from any import restrictions, and that the language of any remedy order for HTS subheadings 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.70.6090, 7212.10.0000 and 7212.50.0000 clearly exclude this product.